

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

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In re:

Daryl Fred Heller

Debtor.

Chapter 11

Case No. 25-11354 (JNP)

**LIMITED OBJECTION TO MOTION OF DARYL FRED HELLER, CHAPTER 11
DEBTOR AND DEBTOR-IN-POSSESSION, FOR AN ORDER AUTHORIZING THE
DEBTOR TO SELL REAL PROPERTY LOCATED AT 7605 PLEASURE AVENUE,
SEA ISLE CITY, NJ FREE AND CLEAR OF ALL LIENS, CLAIMS AND
ENCUMBRANCES PURSUANT TO 11 U.S.C. § 363 (b), (f) AND (m); AND GRANTING
RELATED RELIEF**

Deerfield Capital, LLC (“Deerfield” or “Movant”) asserts the following Limited Objection to the entry of an order authorizing the Debtor to sell the real property located at 7605 Pleasure Avenue, Sea Isle City, NJ (the “Property”) to Brett and Gail Levin and/or their assignee or designee free and clear of all liens, claims, and encumbrances pursuant to 11 U.S.C. § 363(b), (f), and (m); and for related relief (the “**Motion**”), and in support thereof avers as follows:

1. Deerfield Capital, LLC (“Deerfield”) is a limited liability company formed and operating in the Commonwealth of Pennsylvania, with a mailing address of 16 Deerfield Road, Lancaster, PA 17603. Deerfield is a secured creditor of the Debtor.

2. Deerfield does not object to the sale of the Property to Brett and Gail Levin as set forth in the Motion.

3. Deerfield does object to the distribution of any of the balance of the Sale Proceeds, as defined in the Motion. To be clear, Deerfield objects to any distribution to either Randall S. Leaman and/or Debtor's estate without further Order of the Court.

4. The Debtor has filed a separate adversary action against Deerfield seeking to determine the extent, validity and priority of Deerfield's lien as to the Property.

5. As such, Deerfield reserves all rights, remedies, and claims, including, but not limited, to any proceeds owed or sought to be distributed to Mr. Randall S. Leaman and/or Debtor's estate.

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By: 

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Dated: March 25, 2025